

UNITED STATES DISTRICT COURT
FOR THE WESTERN DISTRICT OF VIRGINIA
(ROANOKE DIVISION)

JEFFREY S. MEADOWS,)
Plaintiff,)
v.)
NORTHROP GRUMMAN INNOVATION)
SYSTEMS, INC.,) Case No. 7:19-cv-00394-MFU
BAE SYSTEMS, INC.,)
and)
BAE SYSTEMS ORDNANCE SYSTEMS,)
INC.,)
Defendants.)

**NORTHROP GRUMMAN INNOVATION SYSTEMS, INC.'S
OPPOSITION TO PLAINTIFF'S MOTION TO REMAND**

COMES NOW Defendant Northrop Grumman Innovation Systems, Inc. ("NGIS"), by counsel, and files this Opposition to Plaintiff's Motion to Remand and in support thereof states as follows:

NGIS consented to the removal of this matter from the Virginia Circuit Court for Montgomery County by Defendants BAE Systems, Inc. and BAE Systems Ordnance Systems Inc. (collectively, "BAE"), as set forth in the Notice of Removal. Plaintiff now requests that this Court remand this matter to the Virginia Circuit Court for Montgomery County, asserting that BAE failed to meet its burden for establishing federal subject matter jurisdiction.

NGIS opposes Plaintiff's Motion to Remand for the reasons set forth in BAE's Opposition to Plaintiff's Motion to Remand, and NGIS joins in their opposition and adopts the argument and

authority set forth therein as if set forth here in its entirety. NGIS respectfully requests that this Court find that it has subject matter jurisdiction over this matter and deny Plaintiff's Motion to Remand.

WHEREFORE, for the foregoing reasons, NGIS respectfully requests that this Court deny Plaintiff's Motion to Remand.

Respectfully submitted,

**NORTHROP GRUMMAN INNOVATION
SYSTEMS, INC.**

By: s/James K. Cowan, Jr.

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*Counsel for Defendant
Northrop Grumman Innovation Systems, Inc.*

CERTIFICATE OF SERVICE

The undersigned hereby certifies that a true and exact copy of the foregoing Opposition to Plaintiff's Motion to Remand was filed via ECF this 16th day of August 2019.

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